

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

IN RE:)	CHAPTER 7
)	
HELEN CAIN DOYLE,)	
)	Case No. 19-20124-JRS
Debtor(s).)	
_____)	
)	
FIRST AMERICAN TITLE INSURANCE)	
COMPANY AND GMAC MORTGAGE, LLC,)	
)	
Plaintiff(s),)	
)	
v.)	Adversary Proceeding
)	
HELEN CAIN DOYLE A/K/A HELEN)	Case No. 19-2022
ELIZABETH DOYLE A/K/A ELIZABETH C.)	
DOYLE; JEFFREY L. FREELAND;)	
GEORGIA RECOVERY SERVICE, INC.,)	
)	
Defendant(s).)	
_____)	

PLAINTIFFS' REPORT OF RULE 26(f) CONFERENCE

FIRST AMERICAN TITLE INSURANCE COMPANY and GMAC MORTGAGE, LLC (hereinafter collectively referred to as "Plaintiffs") have attempted to confer with the Defendants pursuant to FED R. CIV. P. 26(f) and BLR 7016(1), but Defendants have filed their own response. Plaintiffs hereby file this written report as follows:

1. Initial Disclosures. (Include one or more of the following, modified as appropriate.)

- ☐ The parties have made the initial disclosures required by FED R. CIV. P. 26(a)(1).
- ☐ The parties agree to exchange written and verified initial disclosures.
- ☒ The Plaintiffs have agreed not to make initial disclosures and to waive the requirements of FED R. CIV. P. 26(a)(1) with regard to same.

2. **Discovery Plan.** The Plaintiffs propose to the Court that discovery shall be completed by December 31, 2019, subject to modification by the Court with the consent of the parties or for good cause shown.

3. **Other items.**

(a) The parties shall submit a consolidated pretrial order no later than December 15, 2019. See Bankruptcy Local Rule 7016-2.

(b) Unless further ordered by the Court, Plaintiff will be allowed until November 15, 2019, to file motions to join additional parties and until November 15, 2019, to file motions to amend the pleadings.

(c) Unless further ordered by the Court, Defendant will be allowed until November 15, 2019, to file motions to join additional parties and until November 15, 2019, to file motions to amend the pleadings.

(d) All dispositive motions, including Motions for Summary Judgment, will be filed by March 31, 2020.

4. **Settlement Potential.**

(a) The parties ☐ have ☒ have not discussed settlement.

(b) The parties ☒ do ☐ do not intend to hold additional settlement conferences among themselves prior to the close of discovery. The proposed date of the next settlement conference is November 1, 2019, in person.

(c) The parties ☐ have ☒ have not considered alternative dispute resolution.

(d) Settlement prospects may be enhanced by one of the following alternative dispute resolution procedures [check applicable boxes]: ☐ Mediation; ☐ Judicial settlement conference; ☒ Early neutral evaluation; ☐ Other.

5. Identify any other matters regarding this Court's authority or jurisdiction, discovery or case management that may require the Court's attention (e.g., concerns about confidentiality; the need for protective orders; unmovable scheduling conflicts). If this is not a core proceeding, do the parties consent to this Court entering a final judgment on any non-core matters in the proceeding?¹

None.

6. Any other matters not covered above. None.

7. Whether the parties ☐ do ☒ do not request a conference with the Court prior to entry of the scheduling order. Any such conference may be ☐ by telephone ☐ in chambers ☐ in Court.

Respectfully submitted this 9th day of July, 2019,

A handwritten signature in black ink, appearing to read 'M. Totten', is written over a horizontal line.

MATTHEW F. TOTTEN

Georgia Bar No. 798589

MONICA K. GILROY

Georgia Bar No. 427520

ATTORNEYS FOR PLAINTIFFS

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CERTIFICATE OF SERVICE

This is to certify that on July 9, 2019, I caused a copy of the PLAINTIFFS' REPORT OF RULE 26(f) CONFERENCE to be served upon Defendants pursuant to F.R.Bank.P. 7004(b)(1) via United States First Class Mail, postage prepaid, addressed as follows:

Helen Cain Doyle
254 Freeland Road,
Dawsonville, Georgia 30534

JEFFREY L. FREELAND
254 Freeland Road,
Dawsonville, Georgia 30534

GEORGIA RECOVERY SERVICE, INC.
Attn: JEFFREY L. FREELAND, Reg. Agent
254 Freeland Road,
Dawsonville, Georgia 30534

GEORGIA RECOVERY SERVICE, INC.
254 Freeland Road,
Dawsonville, Georgia 30534

This 9th day of July, 2019.

THE GILROY FIRM
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/s/ Matthew F. Totten
MONICA K. GILROY
Georgia State Bar No. 427520
MATTHEW F. TOTTEN
Georgia State Bar No. 798589
ATTORNEYS FOR PLAINTIFF

SCHEDULING ORDER

Upon review of the information contained in the Preliminary Report and Discovery Plan form completed and filed by the parties, the Court orders that the time limits for adding parties, amending the pleadings, filing motions, completing discovery, and discussing settlement are as stated in the above completed form, except as herein modified:

IT IS SO ORDERED, this _____ day of _____, 201__.

THE HONORABLE DISTRICT JUDGE